App. Ser. No.: 10/718,218 Atty. Dkt. No. ROC920030251US1

PS Ref. No.: IBMK30251

#### REMARKS

This is intended as a full and complete response to the Final Office Action dated March 20, 2007, having a shortened statutory period for response set to expire on June 20, 2007. Applicants submit this response to place the application in condition for allowance or in better form for appeal. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, paragraph [0029] has been amended to correct minor editorial problems.

Claims 1, 3-41 are pending in the application. Claims 1, 3-41 remain pending following entry of this response. Claims 1, 18 and 37 have been amended. Applicants submit that the amendments do not introduce new matter.

## Claim Objections

Claims 1 and 18 are objected to because of informalities. Applicants have amended these claims to correct the informalities and, thus, respectfully request withdrawal of this rejection.

### Claim Rejections - 35 U.S.C. § 101

Claim 20-38 are rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter.

Applicants have amended paragraph [0029] of the specification to remove references to "wireless communication" from the intended meaning of the term "medium." Accordingly, Applicants respectfully request withdrawal of this rejection.

App. Ser. No.: 10/718,218 Atty. Dkt. No. ROC920030251US1 PS Ref. No.: IBMK30251

### Claim Rejections - 35 U.S.C. § 102

Claims 1, 2-4, 6-8, 10-19, 20-23, 25-27 and 29-41 are rejected under 35 U.S.C. § 102(e) as being anticipated by *Kawakura et al.* (U.S. Publication 2004/0034521, hereinafter, "*Kawakura*"). Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, Kawakura fails to teach each and every element of the claims. For example, with respect to claims 1, 20, 25, 39 and 40, Kawakura fails to teach "creating an effective data abstraction model by modifying the data abstraction model in accordance with a view that reflects one or more security settings for a group of users," as recited in the claims. As described in paragraphs [0064-0067] of the present application, creating an effective data abstraction model based on a view, as claimed, allows different groups of users to view different translations (most appropriate for their need) and/or control what fields are presented to a group of users.

Regarding this element of claims 1, 20, 25, 39 and 40, the Examiner cites Kawakura, paragraphs [0179]-[0181]. The cited paragraphs state:

[0179] Furthermore, during user authentication, it is possible to designate a "language" for use in this session. More specifically speaking, the relay server 3 may open a dialog box for selecting a language to prompt to input a language. The language designation is associated with a request for user authentication and transmitted together to the relay server 3 as the first identification information of a language code.

App. Ser. No.: 10/718,218 Atty. Dkt. No. ROC920030251US1

PS Ref. No.: IBMK30251

[0180] When receiving the request for user authentication as well as a language code, the relay server 3 extracts language-dependent data from the request data to transfer the remaining language-independent data to the server system 1.

[0181] At this time, the relay server 3 judges whether or not the language is supported with reference to the language code as received, and, if not supported, returns a response indicative of an error to the client system 2. If the language is supported by the relay server 3, the relay server 3 saves the language information in the session managing unit 39 together with the result of the user authentication and makes use of the language information to handle requests from the same user until log-out.

In summary, the cited paragraphs describe how an individual user may be presented with a "dialog box for selecting a language," and how that language information may be stored "in the session managing unit 39 together with the result of the user authentication" in order "to handle requests from the same user until log-out." However, the cited material, and *Kawakura* generally, does not teach creating any type of data model by modifying another data model. Further, *Kawakura* does not teach creating a data model according to "a view that reflects one or more security settings for a group of users," as recited in the claims.

With respect to claims 6, 17, 36, and 41, Kawakura fails to teach "providing translation information for the data abstraction model describing translations of each of the plurality of logical fields from a first natural language expression to two or more second natural language expressions" and "displaying one of the second natural language expressions to a user, wherein which of the two or more second natural language expressions is displayed depends upon which natural language expression files are loaded to define a language resource component associated with the data abstraction model," as recited in the claims. As described, for example, in paragraphs [0063] of the present application, providing two or more natural language expressions and selecting one of those for display, as claimed, allows users to see different views of a data model, depending on which natural language files are loaded, allowing different

App. Ser. No.: 10/718,218 Atty. Dkt. No. ROC920030251US1 PS Ref. No.: IBMK30251

translations to be displayed in different circumstances. The Examiner asserts that this

element of claims 6, 17, 36 and 41 is disclosed by *Kawakura*, paragraphs [0143], [0148]-[0149], which state:

[0143] When a user transmits request data for a service from the client system 2 to the relay server 3 while a language is designated, the client data receiving section 33 receives this request data and transfer it to the request data separating section 32. Since a language is designated by this user, a language code is transmitted to the relay server 3 as the first identification information.

[0148] Next, as illustrated in FIG. 9, the data generation section 37 receives the response data d2 from the server data receiving section 36. analyzes the request data d2 to obtain data d2' which is easily handled by internal processing and confirms data items to be translated in the other language with reference to the data list d8 indicative of items to be used in different languages. In this case, the language information, the hotel names and the event names are data items to be translated in the other language. Next, these data items to be translated in the other language are replaced by the replacement data d7 as received from the data processing section 34 to generate data d9. In accordance with the data list d8, the process as designated of the language designation information (Language=ja) is "addition" so that language information is added to the original response data d2. The process as designated of other items, i.e., the hotel names and the event names is "replacement by multilingual data" so that the original English response data d2', i.e., "HOTEL Tokyo" and "Valentine Fair" is replaced by corresponding Japanese data. In this case, there is no corresponding Japanese data to the event "Winter Plan" so that the English data is used as it is. Next, the data d9 is created from data d9' in order to conform with the interface of the client system 2 and transferred to the client data transmitting section 38.

[0149] By this configuration, it is possible to replace the English response data d2' as output from the server system 1 in response to the request from the client system 2 by Japanese data d9 and output it to the client system 2.

In summary, the cited paragraphs describe how a "user transmits request data" that includes a "language code," and how then "data items to be translated in the other language are replaced by the replacement data." Thus, *Kawakura* teaches translating queries based on a user language code. However, the cited material, and *Kawakura* generally, does not teach that any translation displayed is dependent on which files are

App. Ser. No.: 10/718,218 Atty. Dkt. No. ROC920030251US1 PS Ref. No.: IBMK30251

loaded. Further, Kawakura does not teach the use of any kind of natural language files, as recited in the claims.

For these reasons, Applicants submit claims 1, 20, 25, 39, 40, 6, 17, 36 and 41, as well as their dependents, are allowable, and respectfully request withdrawal of this rejection.

# Claim Rejections - 35 U.S.C. § 103

Claims 5, 9, 24 and 28 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Kawakura* as applied to claims above, and in view of *Inanoria* (U.S. Publication 2004/0046789).

These claims depend, directly or indirectly, on claims that are believed to be allowable, for reasons discussed above. Accordingly, Applicants submit these claims are also allowable and respectfully request withdrawal of this rejection.

App. Ser. No.: 10/718,218 Atty. Dkt. No. ROC920030251US1

PS Ref. No.: IBMK30251

## Conclusion

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

If the Examiner believes any issues remain that prevent this application from going to issue, the Examiner is strongly encouraged to contact Gero McClellan, attorney of record, at (336) 643-3065, to discuss strategies for moving prosecution forward toward allowance.

Respectfully submitted, and S-signed pursuant to 37 CFR 1.4,

/Randol W. Read, Reg. No. 43.876/

Randol W. Read Registration No. 43,876 PATTERSON & SHERIDAN, L.L.P. 3040 Post Oak Blvd. Suite 1500

Houston, TX 77056 Telephone: (713) 623-4844

Facsimile: (713) 623-4846 Attorney for Applicants